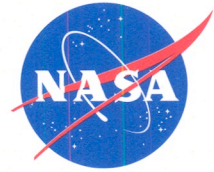


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 19, 2012

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association (STA) Reception on March 20, 2012

On March 20, 2012, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception celebrating the 100th anniversary of the birthday of space pioneer, chief architect of the Saturn V Moon Rocket, and first director of Marshall Space Flight Center, Dr. Wernher von Braun. The reception will be held in the Rayburn House Office Building, Room 2325, in Washington, D.C., from 5 PM to 7 PM. This event will feature the following guest speakers:

- Charles F. Bolden, Jr., Administrator, NASA
- Congressman Robert Aderholt
- Congressman Mo Brooks
- Gene Goldman, Acting Director, NASA Marshall Space Flight Center
- Robert Lightfoot, Associate Administrator, NASA
- Curt von Braun, Executive, Raytheon

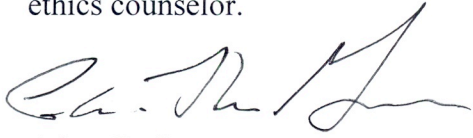
STA member organizations that support STA activities include Aerojet, ATK, Ball Aerospace, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, Pratt & Whitney Rocketdyne, United Launch Alliance, United Space Alliance, and Wyle.

Approximately 300 people have been invited to attend, including representatives from the Executive Office of the President, Congressional offices, NASA personnel, DOD, the aerospace industry, and the media. The estimated cost of the breakfast, including all food and beverages, is \$25 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding NASA policies and programs with interested representatives from other organizations and sectors. Accordingly, NASA employees whose duties do not substantially affect the STA or a majority of its members, including NASA employees in non-career positions who are required to sign the ethics pledge

under Executive Order 13490, may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

However, NASA employees whose duties may substantially affect the STA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read 'Adam F. Greenstone', with a stylized flourish at the end.

Adam F. Greenstone